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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

July 31, 2024

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA,

v.

**ALFRED JACOBY GREEN,
a/k/a “Coby,”**

KELVIN GEORADE JACKSON,

**DEANDRE MARQUEL FIZER,
a/k/a “Dre,”**

JONATHAN ROSS SIUM,

ALEXUS MONIQUE HATCHETT,

SHAWANDA JOHNSON-SMITH,

JESSICA FERGUSON,

ELBERT JACKSON,

TRAMAINE LAVON BATISTE,

and

DENZEL CURTIS DWAYNE PINK,

Defendants.

CASE NO. 4:24-cr-404

JUDGE Hanen

INDICTMENT

18 U.S.C. § 2

18 U.S.C. § 922(g)

18 U.S.C. § 924(c)(1)(A)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(ii)

21 U.S.C. § 841(b)(1)(B)(ii)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 846

21 U.S.C. § 856

21 U.S.C. § 860

FORFEITURE

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT ONE
Title 21, United States Code, Section 846
Conspiracy to Possess with Intent to Distribute and Distribute a Controlled Substance

Beginning no later than in or about March 2023, the exact date being unknown, and continuing up to and including the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**ALFRED JACOBY GREEN,
a/k/a “Coby,”**

KELVIN GEORADE JACKSON,

**DEANDRE MARQUEL FIZER,
a/k/a “Dre,”**

JONATHAN ROSS SIUM,

ALEXUS MONIQUE HATCHETT,

SHAWANDA JOHNSON-SMITH,

JESSICA FERGUSON,

ELBERT JACKSON,

and

TRAMAINE LAVON BATISTE,

did knowingly and intentionally conspire and agree with each other, and others known and unknown to the Grand Jury, to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

QUANTITY ATTRIBUTIONS

Defendants, **ALFRED JACOBY GREEN, a/k/a “Coby,” KELVIN GEORADE JACKSON, DEANDRE MARQUEL FIZER, a/k/a “Dre,” ALEXUS MONIQUE**

HATCHETT, JONATHAN ROSS SIUM, SHAWANDA JOHNSON-SMITH, and JESSICA FERGUSON, knew from their own conduct as members of the conspiracy charged in Count One and from the readily foreseeable conduct of other members of that conspiracy that the conspiracy involved a quantity of at least 5 kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

Defendant, **ELBERT JACKSON**, knew from his own conduct as a member of the conspiracy charged in Count One and from the readily foreseeable conduct of the other members of that conspiracy that the conspiracy involved a quantity of at least 500 grams of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii).

Defendant, **TRAMAINE LAVON BATISTE**, knew from his own conduct as a member of the conspiracy charged in Count One and from the readily foreseeable conduct of other members of that conspiracy that the conspiracy involved a quantity of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about March 29, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** and **ALEXUS MONIQUE HATCHETT**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute at least 5 kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, isomers and salts of its isomers, a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

COUNT THREE

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about March 29, 2024, in the Southern District of Texas, defendant, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one firearm, to wit, a loaded Glock 17 9mm pistol, bearing serial number BEYA797, and said firearm having been shipped and transported in interstate and foreign commerce,

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FOUR

Title 18, United States Code, Section 924(c)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about March 29, 2024, in the Southern District of Texas, defendant, **DEANDRE MARQUEL FIZER, a/k/a “Dre,”** did knowingly possess at least one firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Two of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

Title 21, United States Code, Section 841(a)(1)

Possession with Intent to Distribute a Controlled Substance

On or about April 10, 2024, in the Southern District of Texas, defendants, **ALFRED JACOBY GREEN a/k/a “Coby”** and **ELBERT JACKSON**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute and did distribute a quantity of cocaine, its salts, isomers and salts of its isomers, a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 10, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN a/k/a “Coby,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Hi-Point, 40 caliber handgun, bearing serial number X7287275, and said firearm having been shipped and transported in interstate and foreign commerce,

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT SEVEN

Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 10, 2024, in the Southern District of Texas, defendant, **ELBERT JACKSON,** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Hi-Point, 40 caliber handgun, bearing serial number X7287275, and said firearm having been shipped and transported in interstate and foreign commerce,

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT EIGHT

Title 18, United States Code, Section 924(c)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about April 10, 2024, in the Southern District of Texas, defendant, **ELBERT JACKSON**, did knowingly possess at least one firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Five of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT NINE

Title 21, United States Code, Section 841(a)(1)

Possession with Intent to Distribute a Controlled Substance

On or about April 16, 2024 through April 17, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants, **ALFRED JACOBY GREEN, a/k/a “Coby,”** **KELVIN GEORADE JACKSON**, and **SHAWANDA JOHNSON-SMITH**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute at least 5 kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

COUNT TEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about April 17, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN, a/k/a “Coby,”** did knowingly and intentionally possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

COUNT ELEVEN

Title 18, United States Code, Section 924(c)(1)(A)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about April 17, 2024, in the Southern District of Texas, the defendant, **ALFRED JACOBY GREEN, a/k/a “Coby,”** did knowingly possess at least one of the following firearms:

- a. Desert Eagle .50 caliber pistol, bearing serial number DK0010640,
- b. M&P Shield 9mm pistol, bearing serial number N HLL8317,
- c. JTS 12-gauge shotgun, bearing serial number MK2016913,
- d. Palmetto State Armory 556 pistol, bearing serial number 806822,
- e. Springfield Armory 1911 45 caliber pistol, bearing serial number P197288,
- f. FN 5.7 pistol, bearing serial number 386409950,
- g. Glock 23 Gen 4 pistol, bearing serial number BHGX622,
- h. Ruger Prescott 5.7 pistol, bearing serial number 641-56433,
- i. Palmetto State Armory 556 pistol, bearing serial number 806223,
- j. Springfield Armory XDE 45 ACP pistol, bearing serial number HE109936, and
- k. Ruger LCP pistol, bearing serial number 372282232,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Ten of this indictment,

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWELVE
Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 17, 2024, in the Southern District of Texas, defendant, **ALFRED JACOBY GREEN, a/k/a “Coby,”** knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one of the following firearms, to wit:

- a. Desert Eagle .50 caliber pistol, bearing serial number DK0010640,
- b. M&P Shield 9mm pistol, bearing serial number N HLL8317,
- c. JTS 12-gauge shotgun, bearing serial number MK2016913,
- d. Palmetto State Armory 556 pistol, bearing serial number 806822,
- e. Springfield Armory 1911 45 caliber pistol, bearing serial number P197288,
- f. FN 5.7 pistol, bearing serial number 386409950,
- g. Glock 23 Gen 4 pistol, bearing serial number BHGX622,
- h. Ruger Prescott 5.7 pistol, bearing serial number 641-56433,
- i. Palmetto State Armory 556 pistol, bearing serial number 806223,
- j. Springfield Armory XDE 45 ACP pistol, bearing serial number HE109936, and
- k. Ruger LCP pistol, bearing serial number 372282232,

and said firearms having been shipped and transported in interstate and foreign commerce,

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT THIRTEEN
Title 18, United States Code, Section 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 18, 2024, in the Southern District of Texas, defendant, **KELVIN GEORADE JACKSON**, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one of the following firearms, to wit:

- a. loaded Omega shotgun, bearing serial number 20AR-1272,
- b. loaded Heritage Rough Rider Revolver, bearing serial number 1BH872266,
- c. loaded FN 5.7 pistol, bearing serial number 386385221,
- d. loaded Maverick Arms Model 88, bearing serial number MV0995190,
- e. loaded MasterPiece Arms 9mm, bearing serial number FX26306, and
- f. loaded CZ Scorpion EVO 351, bearing serial number E100823,

and said firearms having been shipped and transported in interstate and foreign commerce,

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FOURTEEN
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about March 11, 2024, in the Southern District of Texas, defendants, **ALFRED JACOBY GREEN**, a/k/a “Coby” and **DENZEL CURTIS DWAYNE PINK**, aided and abetted by one another, did knowingly and intentionally possess with intent to distribute and did distribute at least 500 grams of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii), and Title 18, United States Code, Section 2.

COUNT FIFTEEN
Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about May 8, 2024, in the Southern District of Texas, defendant, **TRAMAINE LAVON BATISTE**, did knowingly and intentionally possess with intent to distribute at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance; a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance; a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance; and a mixture and substance containing a detectable amount of Promethazine, a Schedule V controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and (C).

FORFEITURE ALLEGATION

The allegations contained in Counts One, Two, Five, Nine, Ten, Fourteen, and Fifteen of this Indictment are realleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Upon conviction of the controlled substance offenses alleged in these Counts, each defendant shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in these Counts, including, but not limited to the following: a money judgment in the amount of proceeds obtained directly and indirectly as a result of each defendant's participation in the offenses alleged in these Counts.

If any of the property described above, as a result of any act or omission of a defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

The allegations contained in Counts Three, Six, Seven, Twelve, and Thirteen of this Indictment are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g) set forth in Counts Three, Six, Seven, Twelve, and Thirteen of this Indictment, the defendants, **FIZER, GREEN, E. JACKSON, and K. JACKSON**, shall each forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved or used in the commission of any offense for which each such defendant was convicted.

Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c) set forth in Counts Four, Eight, and Eleven of this Indictment, the defendants, **FIZER, E. JACKSON, and GREEN**, shall forfeit to the United States pursuant to Title 18, United States

Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved or used in the commission of the offense.

All in accordance with Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853; Title 28, United States Code, Section 2461(c); and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL

Original Signature on File

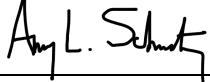
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